

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>7:24-CR-00078-ACA-JHE</b>
	)	<b>SUPERSEDING</b>
<b>SEBASTIAN JAQUE BROWN,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	
	)	

**INDICTMENT**

**COUNT ONE: [21 U.S.C. §§ 841(a)(1) and (b)(1)(D)]**

The Grand Jury charges that:

On or about the 7th day of November 2023, in Tuscaloosa County, within the Northern District of Alabama, the defendant,

**SEBASTIAN JAQUE BROWN,**

did knowingly and intentionally possess with intent to distribute a controlled substance, such offense involving a mixture and substance containing a detectable amount of marijuana, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D).

**COUNT TWO: [18 U.S.C. § 924(c)(1)(A)]**

The Grand Jury charges that:

On or about the 7th day of November 2023, in Tuscaloosa County, within the Northern District of Alabama, the defendant,

**SEBASTIAN JAQUE BROWN,**

knowingly used and carried a firearm, that is, a Glock .45 caliber pistol, a Glock 9mm pistol, a Glock .40 caliber pistol, and a .38 caliber Smith & Wesson pistol, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the drug trafficking crime alleged in Count One of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT THREE: [18 U.S.C. § 922(o)]**

The Grand Jury charges that:

On or about the 7th day of November 2023, in Tuscaloosa County, within the Northern District of Alabama, the defendant,

**SEBASTIAN JAQUE BROWN,**

did knowingly possess a machinegun, that is, a Glock .45 caliber pistol and a Glock 9mm caliber pistol, each having a Glock conversion device installed enabling it to fire automatically more than one shot, without manual reloading, by a single function

of the trigger, commonly referred to as a “Glock Switch,” in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

A TRUE BILL

/s/ electronic signature

FOREPERSON OF THE GRAND JURY

PRIM F. ESCALONA  
United States Attorney

/s/ electronic signature

WILLIAM R. MCCOMB  
Assistant United States Attorney